

## Exhibit B

### Rule 384 Motion



## SUPREME COURT OF ILLINOIS

SUPREME COURT BUILDING  
200 East Capitol Avenue  
SPRINGFIELD, ILLINOIS 62701-1721

CAROLYN TAFT GROSBOLL  
Clerk of the Court

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January 4, 2012

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In Re: Ivy v. Abbott Laboratories, Inc.  
113615

Attn:

This office has received and filed as of January 3, 2012  
the following in the above entitled cause:

\_\_\_\_\_ Petition for Leave to Appeal.  
\_\_\_\_\_ Motion for Extension of Time to File Petition.  
\_\_\_\_\_ Motion to File Petition Instantly.  
  
\_\_\_\_\_ Notice of Appeal (docketing statement due within 14 days).  
\_\_\_\_\_ Motion for Direct Appeal (Rule 302(b)).  
\_\_\_\_\_ Motion for Supervisory Order (Rule 383).  
\_\_\_\_\_ Motion for Mandamus (Rule 381).  
X \_\_\_\_\_ Motion for Consolidation (Rule 384).

Please include the Supreme Court case number in all  
correspondence and documents.

**Case No.**

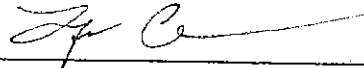
1. The nine lawsuits identified in the attached Appendix of Actions (“Depakote Cases”) are pending in St. Clair County (five cases), adjacent Madison County (one cases), and Cook County (three cases). Plaintiffs brought each of these suits against Defendant, Abbott Laboratories, Inc. (“Abbott”), for injuries resulting from Abbott’s prescription drug Depakote. The Depakote Cases present common questions of fact concerning Abbott’s development, testing,

manufacturing, and marketing of Depakote, as well as the common questions of law regarding Abbott's liability for same.

2. Consolidation will eliminate duplicative discovery and pretrial litigation, prevent inconsistent pretrial and trial rulings, and thereby promote judicial efficiency. Further, consolidation will serve the convenience of the parties and witnesses by allowing the parties to coordinate document discovery and a single set of depositions of the key witnesses.
3. The Circuit Court of St. Clair County is the most appropriate forum for consolidation. The first-filed of the Depakote Cases was filed there on August 17, 2010. Additionally, the majority of the Depakote Cases are currently pending in St. Clair County before Judge Andrew J. Gleeson; therefore, the Twentieth Judicial Circuit Court is familiar with the cases and their issues, and has already spent considerable time and effort on planning and scheduling discovery and hearing motions. Combined with the Madison County case adjacent to St. Clair County, a full two thirds of the pending Depakote Cases are in or near St. Clair County.

WHEREFORE, Plaintiffs respectfully request the Court to issue an Order transferring all the Depakote Cases listed in the accompanying Appendix of Actions, as well as subsequently filed related actions, to the Circuit Court of St. Clair County for consolidated proceedings against Defendant, Abbott Laboratories, Inc.

Respectfully submitted,



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